

Tasman Resource Management Plan - Change 66

Notified : Tuesday, 14 November 2017

Summary of Decisions Requested In Change 66

In Submitter Name Order

Summary of Decisions Requested In Change 66 Submissions

Batt, Roger

46 Marlborough Crescent Richmond

■ **C66.4138.1** **C66 GEN - Change 66**

4138

- Remedy: Ensure that for any new building that might be proposed immediately adjacent to a heritage building the following criteria are met:
- (a) the new building does not obscure the heritage building from the street;
 - (b) a special application be made to council;
 - (c) any proposed section size reduction takes into consideration colour, size, height, design and siting of the new building so as not to detract from the heritage building;
 - (d) setback from boundaries is increased, where necessary.

Borcovsky, Paul & Nita

3 Cresswell Place Richmond

■ **C66.4139.1** **C66 GEN - Change 66**

4139

- Remedy: Retain the Proposed Plan Change.

Burt, David

3 William Street Richmond

■ **C66.4140.1** **C66 GEN - Change 66**

4140

- Remedy: Retain the Proposed Plan Change.

■ **C66.4140.2** **C66 GEN - Change 66**

- Remedy: Write less obscure and less complicated rules in the Proposed Plan Change, providing greater certainty.

■ **C66.4140.3** **C66 GEN - Change 66**

- Remedy: Reduce Council costs and fees associated with the type of development the Plan Change is proposing.

Burt, Ronald P & Shirley A

42 Croucher St Richmond

■ **C66.4141.1** **16.2 Fig. 16.2C - Transport (Access, Parking and Traffic)**

4141

- Remedy: Increase minimum on-site parking requirement for a dwelling to no less than one space per unit and one visitor space per unit in the Richmond Intensive Development Area.

Butler, Edward

20 Staig Street Richmond

■ **C66.4152.1** **C66 GEN - Change 66**

4152

- Remedy: Withdraw the Proposed Plan Change for the Cautley Street character area no. 5

■ **C66.4152.2** **16.2 Fig. 16.2C - Transport (Access, Parking and Traffic)**

- Remedy: Increase provision of more than one car park per dwelling.

■ **C66.4152.3** **C66 GEN - Change 66**

- Remedy: Invest in and improve public transport to enable such developments to be created further from the town centre.

Butler, Lynnette

20 Staig St Richmond

■ **C66.4150.1** **C66 GEN - Change 66**

4150

- Remedy: Retain the Proposed Plan Change.

■ **C66.4150.2** **16.2 Fig. 16.2C - Transport (Access, Parking and Traffic)**

- Remedy: Increase minimum parking requirements in Richmond Intensive Development Area to two spaces per dwelling with tandem parking permitted, and amend visitor parking to two spaces for every three units.

■ **C66.4150.3** **16.2 Fig. 16.2C - Transport (Access, Parking and Traffic)**

- Remedy: Restrict roadside parking to one side of the street only, preventing 'pinchpoints'.

Castle, Bridget

12 Iwa St Mapua

■ **C66.4142.1** **2.2 - Defined Words**

4142

- Remedy: Clarify the definitions of Compact Density development, Comprehensive Residential development, Intensive development and Medium Density development to provide greater distinction and avoid overlapping of meaning.

Summary of Decisions Requested In Change 66 Submissions

Castle, Bridget

- **C66.4142.2** **6.0 - Introduction**
Remedy: Retain issue 6.0(k).
- **C66.4142.3** **6.2.3.2A - Encouraging and Promoting Developments of High Amenity Standard**
Remedy: Add to the end of policy 6.2.3.2A:
"Shared outdoor spaces should include communal gardens allowing for vegetable allotments, cycleways, walkways and playgrounds"
- **C66.4142.4** **6.2.20.1 - Regulatory**
Remedy: Delete the limitation in method 6.2.20.1(g) of minimum house sizes through covenants on subdivisions in the subdivision and zone rules.
- **C66.4142.5** **C66 GEN - Change 66**
Remedy: Delete limitations that in one zone permit only sections of a certain size range to be formed.

Gibson, Graeme & Ronnie

13 Lowry St Richmond

- **C66.4145.1** **16.2 Fig. 16.2C - Transport (Access, Parking and Traffic)** 4145
Remedy: Reword minimum on-site parking requirement for a dwelling so that the requirement is based on:
(i) the bedroom size/occupancy capacity of the dwelling and all other (current or currently proposed) dwellings on the section;
(ii) the capacity for spill-over street parking; and
(iii) current congestion.
- **C66.4145.2** **C66 GEN - Change 66**
Remedy: Include in the proposal for the zone rule changes, reference to the remission of rates policy as it relates to the changes proposed and review the remission of rates policy to include or provide for impacts of Council initiated "zone rules change".

Gimelfarb, Lev

1 Cautley St Richmond

- **C66.4143.1** **17.1.3.4CC - Restricted Discretionary Activities (Bdg Construction or Alteration - Intensive)** 4143
Remedy: Amend condition 17.1.3.4CC(g) to ensure there is no adverse effect of any two-storey dwelling on the views from properties at the top of Cautley Street

Heritage New Zealand

C/o The Heritage Adviser, Planning P O Box 2629 WELLINGTON

- **C66.849.1** **6.0 - Introduction** 849
Remedy: Add new key locational and urban form issue:
"(l) The effect of urban development and expansion on historic and cultural heritage.
- **C66.849.2** **6.1.3.1 - Incorporating Sustainable Urban Design Principles**
Remedy: Amend policy 6.1.3.1(i) by adding to the end:
"and on historic heritage values".
- **C66.849.3** **6.1.3.1 - Incorporating Sustainable Urban Design Principles**
Remedy: Add new item to policy 6.1.3.1:
"(l) locating and designing subdivision and development to facilitate the avoidance of cultural heritage sites where appropriate."
- **C66.849.4** **16.3.3.1 - Controlled Subdivision (Residential Zone)**
Remedy: Amend condition 16.3.3.1(ma) by replacing it with:
"Where the land being subdivided contains a cultural heritage site, all ancillary earthworks to the subdivision must avoid any modification or destruction of recorded archaeological sites and areas where there is reasonable cause to suspect the presence of unrecorded archaeological sites, except as authorised through an archaeological authority obtained under the Heritage New Zealand Pouhere Taonga Act 2014 or where an assessment prepared under 19.2.2.41(b) advises that an archaeological authority is not required."
NOTE: This submission is considered to be beyond the scope of the plan change.
- **C66.849.5** **16.3 - Subdivision**
Remedy: Amend conditions 16.3.4.1(zd), 16.3.5.1(p), 16.3.6.1(n), 16.3.7.1(k) and 16.3.8.1(k) by replacing with:
"Where the land being subdivided contains a cultural heritage site, all ancillary earthworks to the subdivision must avoid any modification or destruction of recorded archaeological sites and areas where there is reasonable cause to suspect the presence of unrecorded archaeological sites, except as authorised through an archaeological authority obtained under the Heritage New Zealand Pouhere Taonga Act 2014 or where an assessment prepared under 19.2.2.41(b) advises that an archaeological authority is not required."
NOTE: This submission is considered to be beyond the scope of the plan change.

Summary of Decisions Requested In Change 66 Submissions

Heritage New Zealand

- **C66.849.6** **16.3.3.1 - Controlled Subdivision (Residential Zone)**
Remedy: Amend the beginning of condition 16.3.3.1(mb), by replacing "Where the listed cultural heritage site is a wahi tapu site" with "Where the land being subdivided contains a cultural heritage site identified as a wāhi tapu site".
NOTE: This submission is considered to be beyond the scope of the plan change.
- **C66.849.7** **16.3 - Subdivision**
Remedy: Amend the beginning of conditions 16.3.4.1(ze), 16.3.5.1(q), 16.3.6.1(o), 16.3.7.1(l) and 16.3.8.1(l) by replacing "Where the listed cultural heritage site is a wahi tapu site" with "Where the land being subdivided contains a cultural heritage site identified as a wāhi tapu site".
NOTE: This submission is considered to be beyond the scope of the plan change.
- **C66.849.8** **16.3.3.1 - Controlled Subdivision (Residential Zone)**
Remedy: Amend note (3) of condition 16.3.3.1(mb) by replacing:
"If any cultural heritage site is exposed during site works then all site works must cease immediately. The areas must be immediately secured in a way that any artefacts or remains are untouched. Manawhenua Iwi, Heritage New Zealand Pouhere Taonga, Department of Conservation, and Tasman District Council must be notified, and the Police in the case of human remains, that an archaeological site has been exposed, so that appropriate action can be taken. This includes such persons being given reasonable time to record and recover archaeological features discovered before work may recommence on the site"
with:
"Appendix X sets out archaeological requirements under the Heritage New Zealand Pouhere Taonga Act 2014. It covers:
- the definition of an archaeological site;
- how to identify recorded archaeological sites and areas where recorded sites can be suspected;
- and an accidental discovery protocol for use where an archaeological authority is not required."
NOTE: This submission is considered to be beyond the scope of the plan change.
- **C66.849.9** **16.3 - Subdivision**
Remedy: Amend note (3) of conditions 16.3.4.1(ze), 16.3.5.1(q), 16.3.6.1(o), 16.3.7.1(l) and 16.3.8.1(l) by replacing:
"If any cultural heritage site is exposed during site works then all site works must cease immediately. The areas must be immediately secured in a way that any artefacts or remains are untouched. Manawhenua Iwi, Heritage New Zealand Pouhere Taonga, Department of Conservation, and Tasman District Council must be notified, and the Police in the case of human remains, that an archaeological site has been exposed, so that appropriate action can be taken. This includes such persons being given reasonable time to record and recover archaeological features discovered before work may recommence on the site"
with:
"Appendix X sets out archaeological requirements under the Heritage New Zealand Pouhere Taonga Act 2014. It covers:
- the definition of an archaeological site;
- how to identify recorded archaeological sites and areas where recorded sites can be suspected;
- and an accidental discovery protocol for use where an archaeological authority is not required."
NOTE: This submission is considered to be beyond the scope of the plan change.
- **C66.849.10** **16.3.3.1 - Controlled Subdivision (Residential Zone)**
Remedy: Amend matter of control 16.3.3.1(17) by removing the word "listed" so it reads:
"Where there is a cultural heritage site present on any part of the land being subdivided..."
NOTE: This submission is considered to be beyond the scope of the plan change.
- **C66.849.11** **16.3 - Subdivision**
Remedy: Amend Matters of control 16.3.4.1(23), 16.3.5.1(17), 16.3.6.1(16), 16.3.7.1(14), and 16.3.8.1(17) by removing the word "listed" so it reads:
"Where there is a cultural heritage site present on any part of the land being subdivided..."
NOTE: This submission is considered to be beyond the scope of the plan change.
- **C66.849.12** **16.3.3.1 - Controlled Subdivision (Residential Zone)**
Remedy: Retain condition 16.3.3.1(d) as notified.
- **C66.849.13** **16.3.3.1A - Controlled Subdivision (Residential Zone - Specific Location: RIDA)**
Remedy: Retain matter 16.3.3.1A(13) as notified.
- **C66.849.14** **16.3.3.1 - Controlled Subdivision (Residential Zone)**
Remedy: Replicate matter of control 16.3.3.1A (13) as a matter of control for standard residential density by adding a new matter of control 16.3.3.1 (21):
Archaeological or Heritage Sites
(21) In relation to land, including a heritage site or item referred to in Schedules 16.13A, 18.1A or 16.13C, and a protected tree referred to in Schedule 16.13B:
(a) whether the proposed subdivision would have an adverse or beneficial effect on the integrity or heritage and protected tree value of the site or item, and the extent of that effect;
(b) the extent to which land integral to the significance of an archaeological site or site of

Summary of Decisions Requested In Change 66 Submissions

Heritage New Zealand

significance to Māori would be separated from that site;
(c) the provisions of any relevant management plan.

- **C66.849.15** **16.3.3.2 - Restricted Discretionary Subdivision (Residential Zone - Listed Cultural Heritage Site)**

Remedy: Amend matter of discretion 16.3.3.2(1) by removing the word "listed" so it reads:
"Where there is a cultural heritage site present on any part of the land being subdivided..."
NOTE: This submission is considered to be beyond the scope of the plan change.

- **C66.849.16** **16.3 - Subdivision**

Remedy: Amend matters of discretion 16.3.4.3(1), 16.3.5.3(1), 16.3.6.3(1), 16.3.7.3(1) and 16.3.8.2(1) by removing the word "listed" so it reads:
"Where there is a cultural heritage site present on any part of the land being subdivided..."
NOTE: This submission is considered to be beyond the scope of the plan change.

- **C66.849.17** **19.2.2.41 - Cultural Heritage Site Assessment**

Remedy: Amend 19.2.2.41(b) (i) and (iv) to:
"(i) the location and extent of any cultural heritage sites and areas where there is reasonable cause to suspect the presence of unrecorded archaeological sites, using a hand-held GPS or similar device to locate the site or area accurately;"
"(iv) any recommended actions to avoid the potential for the modification, damage or destruction of any identified cultural heritage site or area where there is reasonable cause to suspect the presence of unrecorded archaeological sites in terms of its archaeological values;"

Horticulture New Zealand

P O Box 10232 The Terrace WELLINGTON

- **C66.2864.1** **C66 GEN - Change 66**

2864

Remedy: Retain the Proposed Plan Change.

Jones, Sarah

8 Hau Road Motueka

- **C66.4144.1** **C66 GEN - Change 66**

4144

Remedy: Retain the proposed Plan Change.
(200 sqm sections are also needed in Central Motueka.)

McNicoll, Karen

7 Surrey Road Richmond

- **C66.4151.1** **C66 GEN - Change 66**

4151

Remedy: Retain the Proposed Plan Change.

- **C66.4151.2** **16.2 Fig. 16.2C - Transport (Access, Parking and Traffic)**

Remedy: Increase car parking requirements or improve public transport, e.g. frequency and cost.

Michael Reid Ltd

C/o Michael Reid 104 White Road Hope

- **C66.4148.1** **C66 GEN - Change 66**

4148

Remedy: Use this Proposed Plan Change opportunity to maintain and promote the identity of a Special Character Area Zone close to the centre of Richmond: Dorset/Cambridge/Oxford streets and potential for some high quality contemporary higher density housing of 2-3 storeys and possibly some mixed use development, including protecting views of the Holy Trinity Church historic building and retaining some character houses in the area. Involve the Urban Design Panel in all developments in the zone.

National Council of Women of NZ (Inc.)

Tasman Local Issues Group C/o 10 Harriet Court Richmond

- **C66.1503.1** **C66 GEN - Change 66**

1503

Remedy: Retain the Proposed Plan Change in relation to the Upper Queen Street/Salisbury/Darcy Street area.

- **C66.1503.2** **C66 GEN - Change 66**

Remedy: Separate cycle tracks on Salisbury Road from motor vehicles.

Nelson Marlborough District Health Board

Health Protection P O Box 647 NELSON

- **C66.1823.1** **C66 GEN - Change 66**

1823

Remedy: Retain the Proposed Plan Change.

- **C66.1823.2** **C66 GEN - Change 66**

Summary of Decisions Requested In Change 66 Submissions

Nelson Marlborough District Health Board

Remedy: Require housing to cater for accessibility (ease of entering and navigating in and around the home) and adaptability (to cater for changing needs such as experiencing an injury or disability). Include policies and methods that support implementation of universal design principles in housing to ensure housing is accessible and the opportunity to age in place or live independently is provided for.

■ **C66.1823.3** **6.1.3.1A - Encouraging Developments of High Standard Amenity**

Remedy: Amend policy 6.1.3.1A to include universal design principles in Council's Urban Design Guide as it is cheaper and less disruptive to incorporate such features into a new build than retrofit the same house later. (TDC's Urban Design Guide currently only discusses accessibility in so far as residents accessing surrounding urban facilities.)

■ **C66.1823.4** **C66 GEN - Change 66**

Remedy: Enable single storey housing as well as two storeys, as better suited for ageing residents and/or those living with a disability.

■ **C66.1823.5** **6.2.20.1 - Regulatory**

Remedy: Insert new method of implementation (h) to provide developers with financial incentives to incorporate universal design features within the smaller brownfield developments the Plan Change is seeking - such as reducing development contributions and reserve financial contributions, structuring policy and rules to reduce uncertainty, reducing costs for building consent processes, and/or allowing an increased building coverage for homes that incorporate universal design standard as done by Thames-Coromandel District Council.

■ **C66.1823.6** **C66 GEN - Change 66**

Remedy: Require housing to incorporate universal design standards within a certain proportion of large multi-unit developments, as in Banyule City Council, Melbourne.

■ **C66.1823.7** **6.1.3.1A - Encouraging Developments of High Standard Amenity**

Remedy: Amend 6.1.3.1A by inserting "and functionality" after "high standard of amenity" and adding the following policy method:
"(c) promoting and incentivising new residential buildings that incorporate universal design principles in providing for occupants' life stages and changing physical needs.

Nelson Tasman Housing Trust

PO Box 140 Nelson

■ **C66.4146.1** **C66 GEN - Change 66**

Remedy: Retain the Proposed Plan Change.

4146

■ **C66.4146.2** **C66 GEN - Change 66**

Remedy: Amend Plan Change to focus more on its impact on affordability of housing and the potential to provide more social and affordable rental housing alongside owner-occupied speculative building developments.

■ **C66.4146.3** **C66 GEN - Change 66**

Remedy: Provide greater clarity in the Plan that comprehensive developments, as distinct from compact developments, become a Permitted rather than a Controlled activity.

■ **C66.4146.4** **C66 GEN - Change 66**

Remedy: Address the obstacle of restrictive covenants on sites that prevent more than one dwelling per title and/or prevent affordable and social housing being built.

■ **C66.4146.5** **C66 GEN - Change 66**

Remedy: Consider and ensure road widths are adequate in new subdivisions to support future intensification (future proofing), such as comprehensive developments.

■ **C66.4146.6** **16.2 Fig. 16.2C - Transport (Access, Parking and Traffic)**

Remedy: Reduce parking requirements further for all (except standard Residential development) to recognise the future use of e bikes and electric vehicles and the provision of street parking.

Palmer, John

149 Queen Street Richmond

■ **C66.4147.1** **C66 GEN - Change 66**

Remedy: Retain the Proposed Plan Change.

4147

■ **C66.4147.2** **C66 GEN - Change 66**

Remedy: Retain single-storey dwellings for elderly for accessibility reasons as well as cheaper maintenance costs.

■ **C66.4147.3** **C66 GEN - Change 66**

Summary of Decisions Requested In Change 66 Submissions

Palmer, John

Remedy: Consider need for improved amenities for higher density housing within an existing area, e.g. improved open space for children, improved sewerage, reticulated water flow and sewage disposal.

■ **C66.4147.4** **16.2 Fig. 16.2C - Transport (Access, Parking and Traffic)**

Remedy: Increase parking requirements as space for two cars per dwelling plus one space for visitors is not enough.

■ **C66.4147.5** **17.1.3.4CC - Restricted Discretionary Activities (Bdg Construction or Alteration - Intensive)**

Remedy: As identified in condition 17.1.3.4CC(f), consider the effects of shade cast by a two-storey building on a small section over neighbouring properties, and ensure new standards reflect best practice, e.g. in mid-winter in Richmond, a 7.5m high building will cast a shadow of 15.9m at solar noon; in May-July a 7.5m high building will cast a shadow of at least 13.6m.

Tasman District Council staff

Private Bag 4 RICHMOND

■ **C66.2799.1** **16.3.3.1A - Controlled Subdivision (Residential Zone - Specific Location: RIDA)**

2799

Remedy: Add "and without public notification" to the end of the notification note at the end of 16.3.3.1A so it reads:
"Non-Notification
Applications for resource consent that comply with the conditions of this rule 16.3.3.1A will be decided without limited notification and without public notification."

■ **C66.2799.2** **16.3.3.2B - Restricted Discretionary Subdivision (Residential Zone - Specific Location: RIDA)**

Remedy: Add the following notification note to the end of rule 16.3.3.2B:
"Non-Notification
Applications for resource consent that comply with the conditions of this rule 16.3.3.2B will be decided without public notification."

■ **C66.2799.3** **17.1.3.4CC - Restricted Discretionary Activities (Bdg Construction or Alteration - Intensive)**

Remedy: Add "and without public notification" to the end of the notification note at the end of 17.1.3.4CC so it reads:
"Non-Notification
Applications for resource consent that comply with the conditions of this rule 17.1.3.4CC will be decided without limited notification and without public notification."

■ **C66.2799.4** **16.3.3.4 - Discretionary Subdivision (Residential Zone)**

Remedy: Amend proposed condition 16.3.3.4 (a), as amended, by replacing the word 'and' with the word 'or'.

■ **C66.2799.5** **16.3.3.2 - Restricted Discretionary Subdivision (Residential Zone - Listed Cultural Heritage Site)**

Remedy: Amend first paragraph of rule 16.3.3.2 by replacing the reference to (y) with (ma) so it reads:
"Subdivision in the Residential Zone that does not comply with controlled condition (ma) of rule 16.3.3.1 is a restricted discretionary activity."

■ **C66.2799.6** **17.1.3.4BB - Restricted Discretionary Activities (Bdg Construction or Alteration - Std & Compact)**

Remedy: 1. Amend the introductory paragraph of rule 17.1.3.4BB by:
(a) Changing the three references from "7" to "17".
(b) Inserting the words "for standard density development" after the reference to 17.1.3.2 and the words "compact density development" after the reference to 17.1.3.3 so it reads:
"Construction or alteration of a building in the Richmond South, Richmond West, Motueka West, Richmond Intensive, Mapua and Mapua Special development areas and the Motueka West Compact Density Residential Area that does not comply with the conditions of rules 17.1.3.1 and 17.1.3.2 for standard density development and or 17.1.3.3 for compact density development, is a restricted discretionary activity, if it complies with the following conditions:"
2. Amend the heading above condition 17.1.3.4BB(c) by adding the words "Richmond South, Richmond West, Mapua Special Development Area and the Motueka West Compact Density Residential Area" so it reads:
"Compact Density Development - Multiple Consents - Richmond South, Richmond West, Mapua Special Development Area and the Motueka West Compact Density Residential Area".

■ **C66.2799.7** **2.2 - Defined Words**

Remedy: Delete the definition of 'groundwater recharge'.

■ **C66.2799.8** **17.1.20 - Principal Reasons for Rules**

Remedy: Amend the second sentence of the last paragraph of Reasons for Rules 17.1.20 relating to the Richmond Intensive Development Area by:
(a) replacing the words "groundwater recharge preservation" with the words "infiltration of stormwater to ground"; and
(b) replacing the word "secondary" with the word "specified",
so it reads:

Summary of Decisions Requested In Change 66 Submissions

Tasman District Council staff

"To that end, a permitted stormwater standard provides for onsite stormwater detention for additional site coverage resulting from new development, for specified flow path protection and for partial infiltration of stormwater to ground."

- **C66.2799.9** **36.4.2.1A** - **Permitted Activities (Discharges or Diversion of Stormwater or Drainage Water: RIDA)**

Remedy: Amend condition 36.4.2.1A (f) by adding the words "detention and" after the word "including", so it reads:
"(f) All stormwater and sediment control structures associated with the discharge or diversion including detention and specified flood flowpaths are to be maintained in effective operational order at all times."

- **C66.2799.10** **16.3.3.1A** - **Controlled Subdivision (Residential Zone - Specific Location: RIDA)**

Remedy: Insert "protected trees" in the sub-heading of condition 16.3.3.1A(d) so it reads:
"Services, Existing Buildings, Heritage Site or Item Present, Protected Trees, Cultural Heritage Sites, Stormwater and Transport".

- **C66.2799.11** **16.3.3.1A** - **Controlled Subdivision (Residential Zone - Specific Location: RIDA)**

Remedy: Break down 16.3.3.1A matter (13) so that matter (13) refers to archaeological or heritage sites and new matter (13A) refers to protected trees and reword so it reads:
"Archaeological or Heritage Sites
(13) In relation to land, including a heritage site or item referred to in Schedules 16.13A, 16.13C or 18.1A:
(a) whether the proposed subdivision would have an adverse or beneficial effect on the integrity or heritage value of the site or item and the extent of that effect;
(b) the extent to which land integral to the significance of an archaeological site or site of significance to Māori would be separated from that site;
(c) the provisions of any relevant management plan.
Protected Trees
(13A) In relation to a protected tree referred to in Schedule 16.13B:
(a) whether the proposed subdivision would have an adverse or beneficial effect on the protected tree and the extent of that effect;
(b) the provisions of any relevant management plan."

Thomas, Graham

P O Box 3314 RICHMOND

- **C66.3461.1** **6.8** - **Richmond**

3461

Remedy: Include property numbers 43-57 (A&B) Croucher Street within the proposed Richmond Intensive Development Area and alter any other sections of Plan Change 66 as required.

- **C66.3461.2** **ZM 125** - **Richmond North Central**

Remedy: Include property numbers 43-57 (A&B) Croucher Street within the proposed Richmond Intensive Development Area.

Williams, Ben

2/5 Cautley Street Richmond

- **C66.4149.1** **C66 GEN** - **Change 66**

4149

Remedy: Withdraw the Proposed Plan Change.
